

INFORMATION DESIGNATION: INDIVIDUALS

- (i) The name, address, and position of each individual believed to have firsthand knowledge of the facts alleged with particularity in the reply, along with a description of the facts within any such individual's knowledge.

Julie Gardner has first-hand knowledge of the facts alleged in the Complaint regarding the errors in AT&T calculation of its USF pass-through charges and the dollar value of the overcharges resulting therefrom. Ms. Gardner is a Senior Consultant with TechCaliber Consulting, LLC. Her address is 3980 Merriweather Woods, Alpharetta, GA 30022.

INFORMATION DESIGNATION: DOCUMENTS

- (ii) A description of all documents, data compilations, and tangible things in the complainant's possession, custody, or control, that are relevant to the facts alleged with particularity in the reply.

#	Document	Date Prepared, Mailed, Transmitted or Otherwise Disseminated	Author, Preparer, or Other Source	Recipient(s) or Intended Recipient(s)	Physical Location of Exhibit	Description of Relevance to Matters in Dispute
N/A						

INFORMATION DESIGNATION: INVESTIGATION

- (iii) A complete description of the manner in which the complainant identified all persons with information and designated all documents, data compilations, and tangible things as being relevant to the dispute, including, but not limited to, identifying the individual(s) that conducted the information search and the criteria used to identify such persons, documents, data compilations, tangible things, and information.

Complainant retained Julie Gardner of TechCaliber Consulting, Inc. to review the bills it received from AT&T for its **[BEGIN CONFIDENTIAL INFORMATION]** [REDACTED] **[END CONFIDENTIAL INFORMATION]** service in order to determine whether AT&T's billing methodology was flawed. Ms. Gardner's review of Complainant's invoices and related documents confirmed that the flaw was present.